

**BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001**

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**POSTAL RATE AND FEE CHANGES, 2000**

**Docket No. R2000-1**

**INTERROGATORIES OF  
ASSOCIATION FOR POSTAL COMMERCE  
TO USPS WITNESS KINGSLEY  
(PostCom/USPS-T-10-2-3)**

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness Kingsley: PostCom/USPS-T-10-2-3. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



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Counsel for Association for Postal Commerce

PostCom/USPS-T-10-2. Please list and describe all of the factors that cause an automation flat to be less expensive for the Postal Service to handle than a similarly presorted non-automation flat.

(a) Individually for each factor, indicate whether the resulting savings are modeled in the flats mail processing cost model contained in LR-1-90.

(b) For each factor not modeled in LR-1-90, please describe in detail why it reduces Postal Service costs.

(c) For each factor not modeled in LR-1-90, please provide a copy of all studies and reports that discuss the benefits to the Postal Service of the factor.

PostCom/USPS-T-10-3. Please confirm that there is a difference in address quality between automation flats and non-automation flats. If not confirmed, please provide your rationale.

(a) Please describe why there is a difference in address quality between automation flats and non-automation flats.

(b) Please confirm that better address quality stems directly from requirements imposed on automation mail.

(c) Please confirm that ignoring the difference in address quality between automation flats and non-automation flats understates the cost difference between automation flats and non-automation flats.

(e) Please provide copies of all postal Service studies and reports that quantify the difference in address quality between automation flats and non-automation flats.

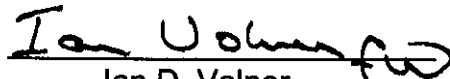
(f) Please describe why poor address quality increases Postal Service costs.

(g) Please describe the mail flow of a flat mailed to the wrong address.

(h) Please provide all Postal Service estimates of the cost of poor address quality.

## CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.

  
Ian D. Volner